

The Honorable Jamal N. Whitehead

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

JASON M. DELESSERT, on his own behalf,
and on behalf of all similarly situated
individuals,

Plaintiff,

v.

KAISER FOUNDATION HEALTH PLAN,
INC.,

Defendant.

Case No. 2:24-cv-2087-JNW

STIPULATED MOTION FOR BRIEFING
SCHEDULE RE MOTION TO DISMISS AND
~~PROPOSED~~ ORDER

NOTE ON MOTION CALENDAR:
March 14, 2025

STIPULATION

Plaintiff Jason M. Delessert (“Plaintiff”), through his counsel Eleanor Hamburger, Richard E. Spoonemore, Daniel S. Gross and Ari Robbins Greene of Sirianni Youtz Spoonemore Hamburger PLLC, and Anna P. Prakash of Nichols Kaster, PLLP, and Defendant Kaiser Foundation Health Plan, Inc., (“Defendant”), through its counsel J. Derek Little and Medora Marisseau of Karr Tuttle Campbell, hereby state that counsel for the Parties participated in conference concerning Defendant’s anticipated motion to dismiss on March 10, 2025 pursuant to Chambers Procedures – Civil, Section 5.6. The Parties had previously stipulated to March 17, 2025 as the deadline for Defendant to respond to Plaintiff’s Complaint, and that if Defendant were to elect to file a motion under Rule 12 in lieu of an answer, the parties agreed to stipulate to a mutually agreeable briefing schedule. *See* Dkt. 7.

Accordingly, the Parties now stipulate and respectfully move the Court to approve to the following schedule for briefing on Defendant's Motion to Dismiss.

EVENT	DEADLINE
Deadline for Defendant to file Motion	March 17, 2025
Deadline for Plaintiff's Response	April 24, 2025
Deadline for Defendant's Reply	May 9, 2025

IT IS SO STIPULATED this 14th day of March, 2025.

**SIRIANNI YOUTZ SPOONEMORE
HAMBURGER PLLC**

s/ Eleanor Hamburger

Eleanor Hamburger (WSBA #26478)
Richard E. Spoonemore (WSBA #21833)
Daniel S. Gross (WSBA #23992)
Ari Robbins Greene (WSBA #54201)
3101 Western Avenue, Suite 350
Seattle, WA 98121
Tel. (206) 223-0303
ehamburger@sylaw.com
rspoonemore@sylaw.com
dgross@sylaw.com
arobbinsgreene@sylaw.com

NICHOLS KASTER, PLLP

Anna P. Prakash, pro hac vice forthcoming
80 S. Eighth Street, Suite 4700
Minneapolis, MN 55402
Tel. (877) 344-4628
aprakash@nka.com

Attorneys for Plaintiff

KARR TUTTLE CAMPBELL

s/J. Derek Little

J. Derek Little, WSBA #40560
Medora A. Marisseau, WSBA No. 23114
701 5th Ave., Suite 3300
Seattle, WA 98104
Telephone: 206-223-1313
Facsimile: 206-682-7100
Email: dlittle@karrtuttle.com
mmarisseau@karrtuttle.com

Attorneys for Defendant

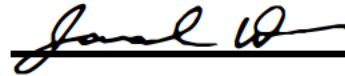
ORDER

Pursuant to the Parties' stipulation, the following briefing schedule is adopted by the Court:

EVENT	DEADLINE
Deadline for Defendant to file Motion	March 17, 2025
Deadline for Plaintiff's Response	April 24, 2025
Deadline for Defendant's Reply	May 9, 2025

IT IS SO ORDERED.

DATED this 19th day of March, 2025.



The Honorable Jamal N. Whitehead

CERTIFICATE OF SERVICE

I, Luci Brock, affirm and state that I am employed by Karr Tuttle Campbell in King County, in the State of Washington. I am over the age of 18 and not a party to the within action. My business address is 701 Fifth Ave., Suite 3300, Seattle, WA 98104. On this day, I caused the foregoing document to be filed with the Court and served on the party listed below in the manner indicated:

Eleanor Hamburger (WSBA #26478)	<input type="checkbox"/>	Via U.S. Mail
Richard E. Spoonemore (WSBA #21833)	<input type="checkbox"/>	Via Hand Delivery
Daniel S. Gross (WSBA #23992)	<input checked="" type="checkbox"/>	Via Electronic Mail
Ari Robbins Greene (WSBA #54201)	<input type="checkbox"/>	Via Overnight Mail
Sirianni Youtz Spoonemore Hamburger PLLC	<input checked="" type="checkbox"/>	CM/ECF via court's website
3101 Western Avenue, Suite 350		
Seattle, WA 98121		
Tel. (206) 223-0303		
ehamburger@sylaw.com		
rspoonemore@sylaw.com		
dgross@sylaw.com		
arobbinsgreene@sylaw.com		
<i>Attorneys for Plaintiff</i>		

Anna P. Prakash, <i>pro hac vice</i> forthcoming	<input type="checkbox"/>	Via U.S. Mail
Nichols Kaster, PLLP	<input type="checkbox"/>	Via Hand Delivery
80 S. Eighth Street, Suite 4700	<input checked="" type="checkbox"/>	Via Electronic Mail
Minneapolis, MN 55402	<input type="checkbox"/>	Via Overnight Mail
Tel. (877) 344-4628	<input checked="" type="checkbox"/>	CM/ECF via court's website
aprakash@nka.com		
<i>Attorneys for Plaintiff</i>		

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 14th day of March 2025, at Seattle, Washington.

s/ Luci Brock

Luci Brock
Legal Assistant